



### INTRODUCTION

Advanced Finance Solutions, Inc. is a corporation duly incorporated and registered under the laws of the Republic of the Philippines with its principal office located at 20 F Cyber Sigma, Lawton Avenue, Bonifacio South, Taguig City, 1637 Metro Manila, with Securities and Exchange Commission ("SEC") Registration Number 2022080063542-00 and is authorized and regulated by the SEC as a financing company with license number F-22-0029-37.

Jungle Lending, Inc. is a corporation duly incorporated and registered under the laws of the Republic of the Philippines with its principal office located at 3006 30F, One Corporate Centre, Meralco Avenue corner Julia Vargas Avenue, San Antonio, Pasig City. with Securities and Exchange Commission ("SEC") Registration Number CS202002223 and is authorized and regulated by the SEC as a lending company with license number 3249.

Advanced Finance Solutions, Inc. and Jungle Lending, Inc. are affiliate companies operating under the same brand name, SKYRO.

The term "Company" or "We" as used herein shall refer to Advanced Finance Solutions, Inc. and Jungle Lending, Inc. This Privacy Policy shall govern the contractual relationship between the Company and their respective clients with regard to processing of personal information.

The Company endeavors to protect the right to data privacy of its clients and business partners in accordance with Republic Act No. 10173 also known as the Data Privacy Act (DPA) of 2012, its Implementing Rules and Regulations (IRR), and other relevant laws of the Philippines. This Privacy Policy summarizes how we collect, use, and share information for the purpose of loan transactions and all related activities.

### USER CONSENT

You agree to this Privacy Policy, which includes full consent to the actual or possibility of collecting, processing, cross-border transfer, and storing of Personal Information, as defined in this policy, when you fill out and send any form using our website, sign the application form, loan agreement or use our Services.

You agree that you have read this form, understood its contents, and voluntarily give consent to the collection, use, processing, storage, retention and sharing of your personal data by the Company for the purpose/s described in this form. You hereby acknowledge, authorize and consent to the submission, sharing and disclosure of your personal data, as well as any updates or corrections thereof, and for the purpose/s stated in this form. You authorize the Company to communicate with you character references, spouse, relatives within the first degree of consanguinity (parents and children), and individuals residing in your place of residence in enforcing its right to collect on the loan and this may require sharing of your personal data.

You represent and warrant that any personal data of another person/s you provided in the course of your loan processing and all related activities has been obtained with prior consent and agreement of such person/s to the disclosure to, processing and/or transfer by the Company of such personal data. Thus, you hold the Company free and harmless, and shall indemnify the latter for any claim or complaint of whatever nature filed by such person arising from the collection, processing, transfer or sharing of such personal data by the Company for the purposes stated in this form.

### SCOPE OF USE

This Privacy Policy informs you of our policies on your privacy rights regarding our collection, use, storage, processing, disclosure, and security of your information. This Privacy Policy applies to all information we process in connection with your relationship with us as a customer or potential customer.

### PERSONAL INFORMATION COLLECTION

In order to review any form submitted through our website, and the application form and provide our Services, we may ask you to provide us with certain personally identifiable information that can be associated with you or that can be used to contact or identify you.

Personally identifiable information may include, but is not limited to: a) contact information – such as your full name, contact number, email address, postal address, and other similar information; b) Financial Information – such as full bank account details and/or credit card details; (c) sensitive personal information – such as date of birth, marital status, and/or government-issued ID details; and (d) other information as may be requested for additional processing

requirements; (e) information about your smartphone or another device (e.g IMEI, serial number), including applications installed in such devices (f) telecommunications company usage data (e.g call data records, SMS records, subscription data, payment) (collectively "Personal Information"). Personally identifiable information does not include anonymous or aggregated information in a way that does not allow to identify a specific person. We may also require photographs of you and your Personal Information, as may be applicable, during the application process or while the loan is still active, in order to verify all information you supplied to the Company.

We reserve the right, with prior notice to you, to amend the type of Personal Information you may need to provide by adding new components or deleting existing components from our required identification procedure from time to time.

We may also collect your Personal Information from other sources, such as any information you provide us directly or indirectly, including information collected that you have provided us through other related services.

If you provide information about third parties such as family members, friends, coworkers, you hereby represent and warrant that whose personal information you have provided to us have agreed to the use, processing, storage and/or disclosure of their data in accordance with this policy and all applicable laws.

If you choose not to provide us with any Personal Information we require from you, or if you withdraw your consent, at any time during your use of our Services, to the collection, processing, and/or storage of any Personal Information, as defined in this Privacy Policy, we reserve the right to refuse your request for, or the continuation of, any of our Services.

## **USE OF PERSONAL INFORMATION**

The Personal Information we collect from you will be used to allow us to perform the Services requested from us. We may use your Personal Information to:

- Verify your identity and contact details;
- Calculate the applicant's credit score;
- Provide our Services;
- Process transactions and send notices about your transactions;
- Contact you and update you on the performance of our Services;
- Communicate with you and process your requests;
- Offer surveys, promotions, and marketing communications;
- Improve our Services;
- Contact supplied personal references to verify accuracy of information and coordinate as to the identity and personal circumstances of the client;
- Respond to any inquiries, comments, or concerns regarding our Services;
- Provide Customer Support;
- Collection of delinquent accounts;
- Fraud detection;
- Telco scoring;
- Exercise the Company's legal rights for the protection of its interests;
- Other specified and legitimate purposes determined and declared before, or as soon as reasonably practicable after collection of the Personal Information.

The Personal Information will be uploaded to our server at <https://skyro.ph/>

We do not share your Personal Information with any third parties for their business purposes, such as, including without limitation, marketing and advertising without your express consent and authorization.

## **SERVICE PROVIDERS**

We may employ third-party companies and individuals to facilitate our Services, to provide the Services on our behalf, to perform Services-related actions, or to assist us in analyzing how our Services are used, or to assist us in the collection of delinquent accounts.

These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose, use, or store your Personal Information for any other purpose.

## **SHARING OF PERSONAL INFORMATION**

We may share your Personal Information with third parties, which includes, but is not limited to the following entities:

- Parent and affiliates of the Company, to assist in providing the Services, to help detect and prevent potentially illegal acts and violations of our policies, and to provide proper data analytics, including marketing communications;
- Your employer whether private or government;
- Telecommunication companies (e.g. Globe Telecom, Inc., PLDT, Smart Communications, Sun Cellular,

Converge);

- Utility companies (e.g. Meralco, Maynilad, Manila Water);
- Credit bureaus (e.g. CIC, NFIS, Finscore, Trusting Social, etc.) and collection agencies to report account information, as permitted by law.
- Government agencies (e.g. SSS, GSIS, NSO, BIR, LTO, PSA)
- Remittance companies (e.g. Palawan Express, Cebuana Lhuillier, Petnet, etc.)
- Customer support for customer service purposes;
- Insurance companies and insurance brokers (e.g. Sun Life Grepa Financial Inc., Insular Life, etc.),
- Banking or financial partners, as permitted by law or as required by the contractual business relationship;
- Service Providers, to enable service providers under contract with us to support our business operations, such as fraud prevention, bill collection, marketing, customer service, and technology services.
- Social media platforms (e.g. Facebook; Instagram, Tiktok, etc.)
- E-commerce platforms (e.g. Shopee, Lazada, etc.)
- Courts of Law, government officials, law enforcement, or other regulators in relation to a subpoena, court order, or other legal process or requirement under Philippine law or regulation, when we need to do so to comply with such law or regulation, or when we believe, in our sole discretion, that the disclosure of Personal Information is necessary to prevent physical harm or financial loss, or to report suspected illegal activity or investigate violations of our Terms and Conditions;

You authorize the above – mentioned third parties to share your Personal Information with us including of parent company and affiliates for listed under “USE OF PERSONAL INFORMATION”.

### **SPECIAL NOTICE - MINORS**

Use of our services is not aimed at persons under 18 years old and we will not collect, use, provide or process in any other form any personal information of persons under the age of 18 deliberately.

We therefore also ask you, if you are under 18 years old, please do not send us your personal information (for example, your name, address and email address).

By providing your personal information, you confirm that you are 18 years old and above.

### **ACCESS AND CORRECTION**

If you would like to review, change or delete any Personal Information you have supplied us with, please contact us immediately using our contact information listed below.

### **PERSONAL INFORMATION STORAGE AND RETENTION**

We retain your Personal Information no longer than it is necessary and relevant for our Services for the period of 1 (one) calendar year. We may also retain Personal Information to comply with the requirements of any laws and regulations, to prevent fraud, to resolve disputes and various troubleshoot problems, and to take other actions permitted or required by applicable laws and regulations. Under our data policies, we will dispose Personal Information in a secured manner and in accordance with applicable laws and regulations, after such Personal Information is no longer necessary and ceases to be relevant for our Services, unless applicable laws and regulations require otherwise, or unless the requested by the user in writing.

You agree and authorize us to retain your Personal Information within the period above stated or within the period necessary to implement the purposes which your Personal Information were collected, notwithstanding the denial of the loan application.

### **SECURITY AND PROTECTION MEASURES**

Security of your Personal Information is our priority. Except as indicated in this Privacy Policy, we do not disclose your Personal Information to third parties without your express consent. Further, we take all reasonable procedures and exert our best efforts to ensure all Personal Information received shall be kept confidential and secure, whether online or offline. We protect your Personal Information using a variety of technical and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. We may use and amend from time to time various security measures, as new technology becomes available, as appropriate, such as firewalls and data encryption, access controls to data centers.

### **USE OF COOKIES**

We may use Cookies or similar technologies on your computer or other devices to record information. Cookies are files with a piece of data, which may include an anonymous unique identifier and can be stored on your hard drive to help us improve your access to our website and identify repeat visitors. You are free to decline our Cookies on your computer or other devices unless our Cookies are required to prevent fraud or ensure the security of the website we control.

However, use of the website may be limited if you do not accept our Cookies.

### **PRIVACY POLICY UPDATES**

We may update our Privacy Policy from time to time. We may amend this Privacy Policy at any time by posting a revised version on the <https://skyro.ph/>. You are advised to review this Privacy Policy periodically for the latest information. Changes to this Privacy Policy are effective from the date of posting. By continuing to use our Services, you accept and consent to the updated terms of this Privacy Policy.

### **INQUIRIES AND COMPLAINTS**

If you believe any of your personal data may have been misused or abused, or if you believe that the security and protection of your respective personal data may have been compromised, you may lodge your inquiries and complaints to the Contact Information below and briefly discuss such matter, together with your contact details for reference.

If you are not satisfied with the manner of how your complaint was handled, or if you still believe that there exists a threat of breach of your Personal Information, you may directly lodge your complaint with the National Privacy Commission.

### **CONTACT INFORMATION**

Accordingly, if you have questions or concerns regarding this Privacy Policy, or if you want to inquire or request for information regarding any matter relating to the processing of your respective personal data, you can contact us through the following information:

Email: [care@skyro.ph](mailto:care@skyro.ph)

Address:

Advanced Finance Solutions, Inc.: 20F Cyber Sigma, Lawton Avenue, Bonifacio South, Taguig City, 1637 Metro Manila  
Jungle Lending, Inc.: 3006 30F, One Corporate Center, Meralco Avenue corner Julia Vargas Avenue, San Antonio, Pasig City, 1605 Metro Manila